

217/782-2113

"REVISED"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

Rexam Beverage Can Company
Attn: Geoffrey A. Wortley
8770 West Bryn Mawr Avenue, Suite 175
Chicago, Illinois 60631

Application No.: 95120133

I.D. No.: 031600BRL

Applicant's Designation:

Date Received: March 4, 2003

Operation of: Beverage Can Manufacturing

Date Issued: June 28, 2004

Expiration Date: June 27, 2009

Source Location: 1101 West 43rd Street, Chicago, Cook County

Responsible Official: Geoffrey A. Wortley, Director of Environmental, Health and Safety

This permit is hereby granted to the above-designated Permittee to OPERATE a beverage can manufacturing plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: May 25, 2005

Revision Date Issued: TO BE DETERMINED

Purpose of Revision: Significant Modification

This Permit has been revised for more accurate clarification of non-major HAP status of this source through newly established federally enforceable limits in Condition 5.6.2 by keeping this source below major source HAP applicability threshold. This non-major HAP status excludes can coating operations performed at the source from applicability of 40 CFR Part 63 Subpart KKKK.

If you have any questions concerning this permit, please contact Anatoly Belogorsky at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:AB:psj

cc: Illinois EPA, FOS, Region 1

¹ This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

² Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Rexam Beverage Can Company
1101 West 43rd Street
Chicago, Illinois 60631
773/399-3389

I.D. No.: 031600BRL
Standard Industrial Classification: 3411, Metal Cans

1.2 Owner/Parent Company

Rexam Beverage Can Company
8770 West Bryn Mawr Avenue, Suite 175
Chicago, Illinois 60631

1.3 Operator

Rexam Beverage Can Company
8770 West Bryn Mawr Avenue, Suite 175
Chicago, Illinois 60631

Geoffrey A. Wortley
773/399-3389

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
°C	Degrees Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
cfm	Cubic foot per minute
CFR	Code of Federal Regulations
CMS	Continuous Monitoring System
CO	Carbon Monoxide
DRE	Destruction and Removal Efficiency
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
ft	Feet
g	Grams
gal	Gallon
gr	Grains
HAP	Hazardous Air Pollutant
HCl	Hydrogen Chloride
Hg	Mercury
HWC	Hazardous Waste Combustor
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kW	kilowatts
L	Liter
LAER	Lowest Achievable Emission Rate
lb	pound
MACT	Maximum Achievable Control Technology
Mg	Micrograms
mg	Milligrams
mmBtu	Million British thermal units
mmscf	Million standard cubic feet
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NIC	Notification of Intent to Comply
NOC	Notification of Compliance
NO _x	Nitrogen Oxides

NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM _{2.5}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
POHC	Principal Organic Hazardous Constituent
ppm	parts per million
ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration
RCRA	Resource Conservation and Recovery Act
RMP	Risk Management Plan
scf	Standard cubic feet
scm	Standard cubic meters
SO ₂	Sulfur Dioxide
T	Tons
TEQ	Toxic Equivalency Quotient
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
yr	Year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a) (1) and 201.211, as follows:

Inside Spray Tank

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a) (2) or (a) (3), as follows:

Waste Oil Tank

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a) (4) through (18), as follows:

- a. Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a) (10)].
- b. Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a) (11)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 218.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For

example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 218.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Equipment Description	Date Constructed	Emission Control Equipment
Group 1	Can Coating/Printing Lines	1982-1995	Thermal Oxidizer
Group 2	Can Bodymakers and Washer/Dryers	1982/1995/2003	Oil Mist Collecting System
Group 3	Fuel Combustion Units	1982-1995	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- 5.1.1 The Rexam Beverage Can Company is located at 1101 West 43rd Street in Chicago, Illinois. The source applies decorative and functional coatings on the top of printed images to aluminum beverage cans.
- 5.1.2 This source is located in an area that is non-attainment for ozone and PM_{2.5} and attainment for other pollutants of the National Ambient Air Quality Standards.

5.2 Major Source Status

- 5.2.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.

5.3 Source-Wide Applicable Provisions and Regulations

- 5.3.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions for Specific Emission Units) of this permit.
- 5.3.2 In addition, emission units at this source are subject to the following regulations of general applicability:
 - a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
 - b. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.
 - c. Pursuant to 35 IAC 237.102, no person shall cause or allow open burning, except the Illinois EPA may grant permits for open burning in accordance with 35 IAC 237.201.
- 5.3.3 Fugitive Particulate Matter Operating Program
 - a. This source shall be operated under the provisions of an operating program prepared by the Permittee and

submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)]. The Permittee shall comply with a fugitive particulate matter operating program submitted to the Illinois EPA and incorporated by reference into this permit, and any amendments to the program submitted pursuant to paragraph (b) below.

- b. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].
- c. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

5.3.4 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.3.5 Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the owner or operator shall submit the items below. This condition is

imposed in this permit pursuant to 40 CFR 68.215(a) (2) (i) and (ii).

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by Condition 9.8.

5.3.6 Future Emission Standards

- a. Should this stationary source become subject to a new or revised regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 9.8. This permit may also have to be revised or reopened to address such new or revised regulations (see Condition 9.12.2).
- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable regulations under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B that were promulgated after the date issued of this permit.

5.3.7 Episode Action Plan

- a. Pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If an operational change occurs at the source which invalidates the plan, a revised plan shall be submitted to the Illinois EPA for review within 30

days of the change, pursuant to 35 IAC 244.143(d). Such plans shall be further revised if disapproved by the Illinois EPA.

- d. A copy of the original plan and any subsequent revisions shall also be sent to the Chicago Department of Environmental Control.

5.4 Source-Wide Non-Applicability of Regulations of Concern

This source is not subject to 40 CFR Part 63, Subpart KKKK, "National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans", because the source is not a major source of HAP emissions. (See also Condition 5.6.2)

5.5 Source-Wide Control Requirements and Work Practices

Source-wide control requirements and work practices are not set for this source. There may be requirements for unit specific control requirements and work practices set forth in Section 7 of this permit.

5.6 Source-Wide Production and Emission Limitations

5.6.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.6.1) are set for the purpose of establishing fees and are not federally enforceable (see Section 39.5(18) of the Act).

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	249.5
Sulfur Dioxide (SO ₂)	0.3
Particulate Matter (PM)	45.4
Nitrogen Oxides (NO _x)	41.4
HAP, not included in VOM or PM	----
Total	336.6

5.6.2 Emissions of Hazardous Air Pollutants

The emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). This condition is being imposed so that the

source is not a major source of HAP emissions and the requirements of 40 CFR Part 63, Subpart KKKK do not apply to this source. The Permittee shall fulfill the applicable testing, recordkeeping, and reporting requirements of Conditions 5.7.2, 5.9.3, and 5.10.2.

5.6.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, state rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.7 Source-Wide Testing Requirements

5.7.1 Pursuant to 35 IAC 201.282 and Section 4(b) of the Act, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

- a. Testing by Owner or Operator: The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests [35 IAC 201.282(a)].
- b. Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary [35 IAC 201.282(b)].

- c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.7.2 HAP Testing to Verify Minor Source Status

Pursuant to Condition 5.7.1 and to verify compliance with the requirements of Condition 5.6.2, that this source is not a major source of HAPs, the following testing requirements are established:

- a. If in the previous calendar year, emissions of HAPs exceeded 80% of major source threshold for individual or total HAPs (greater than 8 tons of a single HAP or greater than 20 tons of total HAPs), then testing for HAPs using USEPA Method 311 shall be conducted as follows:

Test the top five coatings, solvents and/or other HAP-containing materials used by the source that make the largest contributions to individual and total HAP emissions. The largest contributions are defined as the product of usage and HAP content. If two coatings differ only in pigment, then both do not have to be tested.

- b. Testing may be conducted by the supplier of the HAP-containing material.
- c. The calculation as to whether the 80% of major source threshold was exceeded shall be based on records and procedures in Condition 5.9.2 and shall be completed by January 31 for the previous calendar year. If testing is required it shall be completed by March 15.
- d. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.8 Records for Source-Wide Monitoring Requirements

Source-wide monitoring requirements are not set for this source. However, there may be provisions for unit specific monitoring set forth in Section 7 of this permit.

5.9 Source-Wide Recordkeeping Requirements

5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate

compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act.

5.9.2 Records for Source-Wide Control Requirements and Work Practices

The Permittee shall keep copy of the fugitive particulate matter operating plan, and any amendments to the plan, as required by Condition 5.3. The Permittee shall also keep a record of activities completed according to the plan.

5.9.3 Records for HAP Emissions

- a. The Permittee shall maintain records of individual and combined HAP emissions on a monthly and annual basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.2, pursuant to Section 39.5(7)(b) of the Act.
- b. If testing is required by Condition 5.7.2, the Permittee shall keep records of the testing, including the test date, conditions, methodologies, calculations, test results, and any discrepancies between the test results and formulation specifications of Condition 5.9.2(c) below.
- c. The Permittee shall keep an MSDS or equivalent document showing the formulation of each coating, including content of all HAPs. These formulation sheets may be used to make the calculation of HAP emissions required by Condition 5.7.2. If the formulation sheet uses a maximum or range value (e.g., less than 1% or range of 2 - 3%) then the highest value shall be used.

5.9.4 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.10 Source-Wide Reporting Requirements

5.10.1 General Source-Wide Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the source with the permit requirements as follows within 30 days, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. There are also reporting requirements for unit specific emission units set forth in Section 7 of this permit.
- b. Upon written request by the Illinois EPA, a report shall be submitted to the Illinois EPA for any period specified in the request stating the following: the dates during which any process emission unit was in operation when the air pollution control equipment was not in operation or was not operating properly, documentation of causes for pollution control equipment not operating or not operating properly, and a statement of what corrective actions were taken and what repairs were made [35 IAC 212.324(g)(6)].

5.10.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information, including HAP emissions, for the previous calendar year.

5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios

Source-wide operational flexibility is not set for this source. However, there may be provisions for unit specific operational flexibility set forth in Section 7 of this permit.

5.12 Source-Wide Compliance Procedures

5.12.1 Procedures for Calculating Emissions

Except as provided in Condition 9.1.3, compliance with the source-wide emission limits specified in Condition 5.6 shall be addressed on the recordkeeping and reporting requirements of Conditions 5.9 and 5.10, and compliance procedures in Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit.

6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.5.
 - i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Condition 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transactions

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Sections 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
 - i. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency; and
 - ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
 - v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and

vi. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

b. This report shall be submitted by November 30 - of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

a. i. The allotment of ATUs to this source is 729 ATUs per seasonal allotment period.

ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 72.804 tons.

A. This determination includes the use of 1994 and 1997 as baseline seasons. This determination includes use of the 1997 season as a substitute for the 1995 and 1996 seasons due to non-representative conditions in those seasons as allowed by 35 IAC 205.320(a).

B. This determination also includes adjustment to actual emissions to account for voluntary over-compliance at the source, e.g., the baseline emissions recognize 6.18 tons of voluntary over compliance from changes to the practices for cleaning solvents, pursuant to 35 IAC 205.320(d) as further addressed in Section 7 of this permit.

iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.10 of this permit.

iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.

v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments for New or Modified Emission Units

Not applicable.

c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:

- i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
- ii. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720; and
- iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS [35 IAC 205.700(a)]:

- a. Seasonal component of the Annual Emissions Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Exclusions from Further Reductions

- a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:
 - i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
 - ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and
 - iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

Make Up Air Unites: EU06, EU07, EU08, EU09
Boilers: EU01, EU02
Washer Ovens: EU03, EU04

- b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.405(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Can Coating/Printing Lines

7.1.1 Description

Cans, which have been washed and dried, are ink printed with printing/coating units (EU11-EU14). Following the ink printing, varnish is applied over the ink and to the bottom of the cans using the printing/coating units (EU11-EU14). Printed and varnished cans are then dried in ovens (EU21-EU23 uncontrolled and EU24 controlled by a thermal oxidizer). Upon drying, the printed cans are conveyed to inside spray machines, which apply a protective coating to the inside of the can (EU31-EU33) and subsequently, the cans cured in inside bake ovens (EU41-EU42 uncontrolled and EU43 controlled by a thermal oxidizer). Coating/printing units (as described in the table of Condition 7.1.2 below) are grouped into the following coating lines: #1 - EU11,EU12,EU21,EU23,EU31, EU41; #2 - EU13,EU22,EU32,EU42; #3 - EU14,EU24,EU33,EU43.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	Printing Units		None
	EU11	1982	
	EU12	1982	
	EU13	1982	
	EU14	1995	
	Uncontrolled Printer Ovens EU21; EU22; EU23	1982	None
	Controlled Printer Oven EU24	1995	Thermal Oxidizer (CD001)
	Inside Spray Machines		None
	EU31	1982	
	EU32	1982	
	EU33	1982	
	Uncontrolled Inside Bake Ovens		None
	EU41	1991	
	EU42	1991	
	Controlled Inside Bake Oven EU43	1995	Thermal Oxidizer (CD001)

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected can coating line" for the purpose of these unit-specific conditions, is a beverage can surface coating line consisting of: four can printing/coating machines (EU11, EU12, EU13, and EU14), four printer ovens (EU21, EU22, EU23 uncontrolled and EU24 controlled), three inside spray machines (EU31, EU32, EU33), and three inside bake ovens (EU41, EU42 uncontrolled and EU43 controlled) that is subject to the NSPS for the Beverage Can Surface Coating Industry, 40 CFR 60 Subparts A and WW, because the source applies overvarnish coating, bottom rim varnish coating and inside spray coating to beverage cans and the source commenced construction, modification, or reconstruction after November 26, 1980. The Illinois EPA administers the NSPS for subject sources in Illinois pursuant to a delegation agreement with the USEPA.
- b. NSPS Standards for volatile organic compounds:

Pursuant to 40 CFR 60.492, no owner or operator shall discharge or cause the discharge of VOC emissions to the atmosphere that exceed the following volume-weighted calendar-month average emissions:

 - i. 0.29 kilogram of VOC per liter of coating solids from each two-piece can exterior base coating operation, except clear base coat;
 - ii. 0.46 kilogram of VOC per liter of coating solids from each two-piece can clear base coating operation and from each overvarnish coating operation; and
 - iii. 0.89 kilogram of VOC per liter of coating solids from each two-piece can inside spray coating operation.
- c. At all times, the Permittee shall also, to the extent practicable, maintain and operate the can coating line including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions, pursuant to 40 CFR 60.11 (d).
- d. Each affected can coating line (not controlled by the thermal oxidizer) at the source is subject to 35 IAC 218.204(b), which requires that:

No owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the specified

coating. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. Compliance with this Subpart must be demonstrated through the applicable coating analysis test methods and procedures specified in 35 IAC 218.105(a) and the recordkeeping and reporting requirements specified in 35 IAC 218.211(c). The emission limitations on and after March 15, 1996 for can coating operations are as follows:

- | | | | |
|-----|--|-------------|---------------|
| i. | | <u>kg/l</u> | <u>lb/gal</u> |
| | Bottom Rim Varnish Coating
and Overvarnish (Exterior
Basecoat) | 0.25 | 2.1 |
| ii. | Interior Body Spray Coat
(Two Piece) | 0.44 | 3.7 |
- e. The can Coating Line #3 is equipped with a capture system and control device (thermal oxidizer) that shall provide 75 percent reduction in the overall emissions of VOM from the coating line and the control device has a 90 percent efficiency, pursuant to requirements of 35 IAC 218.207(h) (2).
- f. Each affected can coating line is subject to the emission limits identified in Condition 5.3.2.
- g. The affected can coating line constructed after April 14, 1972 is subject to 35 IAC 212.321(b) (1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

7.1.4 Non-Applicability of Regulations of Concern

- a. Lithographic printing is performed directly on manufactured cans and not considered subject to 35

IAC 218.405 through 411. This non-applicability determination is based on the definition of "Lithographic Printing Line" under 35 IAC 211.3450, which considers that only printing on web or sheetfed substrate constitute that definition.

- b. Coating operations performed at this source are not subject to 40 CFR Part 63, Subpart KKKK, "National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans", because the source is not a major source of HAP emissions according to the limits established in Condition 5.6.2.

7.1.5 Operational and Production Limits and Work Practices

- a. The Permittee shall comply with the following limits, which were established in Construction Permit 95050064 for emission units EU24 and EU43 (Both part of the Coating Line #3):
 - i. The thermal oxidizer shall be in operation at all times, except the times described below in Condition 7.1.5(a)(ii). Notwithstanding 35 Ill. Adm. Code 218.207, winter shutdown of the afterburner is not permitted.
 - ii. The Permittee is allowed to shutdown the thermal oxidizer for conducting the proper maintenance and necessary repairs without interruption of a regular can coating/printing process performed on line #3. The shutdown time shall not exceed 10 days per each six months period. Such shutdown is not allowed during the ERMS seasonal allotment period (May-September).
 - iii. The afterburner combustion chamber shall be preheated to at least the manufacturer's recommended temperature but not lower than 1400°F before the can coating process is begun. This temperature shall be maintained during operation.
 - iv. The afterburner shall be equipped with a continuous temperature indicator and strip chart recorder or disk storage for the combustion chamber temperature.
- b.
 - i. Total production from Coating Lines #1 and #2 shall not exceed 136 million cans/month and 1,470 million cans/year.
 - ii. Total use of VOM containing cleaning solvent in the Coating Lines #1 and #2 shall not exceed 50 gallons/year.

- iii. These production limitations have been established in Construction Permit 02110035 [T1].
- c. The usage of low VOM containing floor cleaning solution and blanket printer cleaning solution (BY PAS 1500 Series, substituted for MT 50/50 clean-up solvent) shall not exceed 5,000 gallons per year for the entire source.

This is a revision of production limit established in Construction Permit 91030029. This revision reflects application of low VOM water-based cleaning solution instead of VOM solvent-based cleaning solution, which was allowed by Construction Permit 91030029 [T1R].

7.1.6 Emission Limitations

- a. The Illinois EPA has accepted more stringent emission limits established by Construction Permit 02110035 than those established by the earlier issued Construction Permit 79060091 for Lines #1 and #2.
- b. In addition to Condition 5.3.2 and the source wide emission limitations in Condition 5.5, the affected Coating Lines #1 and #2 are subject to the following:
 - i. The amount of VOM contained in individual coatings and clean-up solvents shall not exceed the following limits:

lb VOM/gal

Inside Spray	2.90
Bottom Rim Varnish	2.10
Overvarnish	1.70
Clean-Up Solvents	6.98

- ii. Emissions of VOM from the Coating Lines 1 and 2 combined shall not exceed 25.4 tons/month and 152.4 tons/year.
- iii. Emissions from and operation of each combustion equipment in the Coating Lines 1 and 2 shall each not exceed the followings:

<u>Equipment</u>	<u>Firing Rate (mmBtu/hr)</u>	<u>NO_x Emissions (lb/hr)</u>	<u>(Ton/yr)</u>
Pin Oven	5.6	0.53	2.34
Bake Oven	5.525	0.52	2.28

- iv. The above limitations were established in Permit #02110035, pursuant to 35 IAC Part 203 and 40 CFR 52.21. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 and 40 CFR 52.21[T1].
- v. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 months total).
- c.
 - i. The total VOM usage in applied inks shall not exceed 1.5 tons/month and 18.0 tons/yr.
 - ii. The volatile fraction of each ink, as it is applied to the can, less water and exempt compounds, shall be 40 percent or less by volume.
 - iii. The above limitations were established in Permit #91030029, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203[T1].
 - iv. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 months total).
- d. The affected Coating Line #3 is subject to the following limits:
 - i. VOM usage and associated VOM emissions from this can coating line (excluding VOM associated with solvent cleanup operation) shall not exceed the following limits:

Type of Coating Operation	VOM Usage		VOM Emissions	
	(T/mo)	(T/yr)	(T/mo)	(T/yr)
Overvarnish (Includes Varnish, Rim Varnish, and Inks)	2.12	25.45	0.51	6.1
Inside Spray	6.03	72.4	1.45	17.4

These emission limits are based on the can Coating Line #3 being equipped with a capture system and control device (afterburner) that provides 76 percent reduction in the overall emissions of VOM from the can coating line and the afterburner achieving a minimum reduction in VOM of 95 percent.

- ii. The cleanup solvent usage and associated VOM emissions for manufacturing Line #3 shall not exceed 2.5 tons/year and 0.3 tons/year respectively.
- iii. Emissions associated with natural gas combustion used on Coating Line #3 shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Firing Rate (mmBtu/hr)</u>	<u>NO_x Emissions (lb/hr)</u>	<u>(ton/yr)</u>
Pin Oven	5.6	0.53	2.34
Bake Oven	5.2	0.50	2.17
Afterburner	9.0	0.86	3.75

- iv. The above limitations were established in Permit #95050064, pursuant to 35 IAC Part 203 and 40 CFR 52.21. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 and 40 CFR 52.21[T1].
- v. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 months total).

7.1.7 Testing Requirements

- a. The Permittee shall conduct the following performance tests pursuant to 40 CFR 60.693:
 - i. Pursuant to 40 CFR 60.493(b)(1), the Permittee shall determine the VOC content of the coatings from formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using USEPA Method 24 or equivalent.
 - ii. The Permittee shall perform the following calculations and analysis to calculate the volume-weighted average of the total mass of VOC per volume of coating solids used during

the calendar month for each affected source except as provided in Condition 7.1.7(e). The calculations shall be performed by the following procedures:

- A. Calculate the mass of VOC used ($M_o + M_d$) during the calendar month for the affected source by the following equation:

$$M_o + M_d = \sum_{i=1}^n L_{ci} D_{ci} W_{oi} + \sum_{j=1}^m L_{dj} D_{dj}$$

Where:

M_o = Mass of VOC-solvent in coatings consumed, as received (kg)

M_d = Mass of VOC-solvent added to coatings (kg)

L_c = Volume of each coating consumed, as received (L)

L_d = Volume of each VOC-solvent added to coatings (L)

D_c = Density of each coating, as received (kg/L)

D_d = Density of each VOC-solvent added to coatings (kg/L)

W_o = Portion of VOC in each coating, as received (fraction by weight)

($\sum L_{dj} D_{dj}$ will be 0 if no VOC solvent is added to the coatings, as received.)

- B. Calculate the total volume of coating solids used (L_s) in the calendar month for the affected source by the following equation:

$$L_s = \sum_{i=1}^n L_{ci} V_{si}$$

Where:

n is the number of different coatings used during the calendar month.

- C. Calculate the volume-weighted average mass of VOC per volume of solids used (G) during the calendar month for the affected source by the following equation:

$$G = \frac{M_o + M_d}{L_{T2s}}$$

Where:

L_{T2s} = Volume of coating solids consumed (L)

- iii. Calculate the volume-weighted average of VOC emissions discharged to the atmosphere (N) during the calendar month for the affected source by the following equation:

$$N = G$$

- iv. Where the value of the volume-weighted average of mass of VOC per volume discharged to the atmosphere (N) is equal or less than the applicable emission limit specified in 40 CFR 60.492, the affected source is in compliance.
- v. If each individual coating used by an affected source has a VOC content equal to or less than the limit specified in 40 CFR 60.492, the affected source is in compliance provided no VOC-solvents are added to the coating during distribution or application. [40 CFR 60.493(b)(1)(iv)]
- b. For testing a control device efficiency and overall efficiency (if required by either Illinois EPA or USEPA), the Permittee has to use procedures established in 35 IAC 218.105(c), (d), (e), and (f).

7.1.8 Monitoring Requirements

Compliance Assurance Monitoring (CAM) Provisions:

The thermal oxidizer used with affected Coating Line #3 is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The Permittee shall comply with the monitoring provisions of the Compliance Assurance Monitoring (CAM) Plan described in Attachment 3 pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. The Permittee shall maintain records of the monitoring data, monitor performance data, corrective actions taken, monitoring equipment maintenance, and other supporting information, as required by 40 CFR 64.9(b)(1).

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for each affected coating line to demonstrate compliance with Conditions 5.6.1 and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Each owner or operator subject to 40 CFR Subpart WW shall maintain at the source records of all data and emissions from each affected source in the initial and monthly performance tests. [40 CFR 60.495(d)]
- b. The Permittee shall maintain records of the following items to allow compliance with the limitations and requirements in Conditions 7.1.3 and 7.1.6 to be determined:
 - i. Name and identification of each coating and ink used.
 - ii. Amount of each coating used (gallons/month and gallons of solids/month).
 - iii. VOM and HAP content of each coating used (lb VOM/gallon and HAP/gallon of coating minus water and exempt compounds, and also lb VOM/gallon and HAP/gallon of solids as applied).
 - iv. VOM and HAP content of each coating used (lbs VOM/gallon and lbs HAP/gallon of coating including water and exempt compounds).
 - v. Density of each coating used (lbs/gallon).
 - vi. Amount of each ink used (lbs/month).
 - vii. VOM and HAP content of each ink used (weight percent).
 - viii. Total VOM and HAP usage for inks and coatings (lbs/month).
 - ix. Annual VOM and HAP usage (tons/year) and annual VOM and HAP emissions (tons/year), summing the month's data and the previous 11 months.
 - x. Name and identification of all clean up solvents used.

- xi. Amount of each clean up solvent used (lbs/month).
- xii. VOM and HAP content of each clean up solvent used (weight percent).
- xiii. Amount of clean up solvent reclaimed for reuse or sent offsite for disposal.
- xiv. Monthly VOM and HAP emissions from solvent clean up operation (lbs/month). Annual emissions shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.
- xv.
 - A. Afterburner combustion chamber monitoring data, including charts of the temperature.
 - B. A log of operating time for the capture system, afterburner, monitoring device, and the associated emission unit.
 - C. A maintenance log for the capture system, afterburner and monitoring device detailing all routine and non-routine maintenance performed including dates and duration of any outages.
 - D. Time and duration of any maintenance shutdown of an oxidizer, as allowed by Condition 7.1.5(a)(ii).
- xvi. Monthly and annual can production (cans/month and cans/year) on Lines #1 and #2.
- xvii. Monthly and annual natural gas usage (mmscf/mo and mmscf/yr) on Lines #1-#3.
- xviii. Emissions of regulated air pollutants shall be calculated in accordance with recordkeeping requirements of Condition 7.1.9 and Compliance Procedures of Condition 7.1.12.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected coating line with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. The Permittee shall fulfill the initial compliance reporting requirements of 40 CFR 60.495(a) including:
 - i. Coatings which individually have a VOC content equal or less than the limits specified in 40 CFR 60.492 are used, and no VOC is added to the coating during the application or distribution process, the owner or operator shall provide a list of the coatings used for each affected source and the VOC content of each coating calculated from data determined using Reference Method 24 or supplied by the manufacturers of the coatings.
 - ii. Where one or more coatings which individually have a VOC content greater than the limits specified in 40 CFR 60.492 are used in the coating process, the owner or operator shall report for each affected source the volume-weighted average of the total mass of VOC per volume of coating solids.
- b. Following the initial performance test, each owner or operator shall identify, record, and submit quarterly reports to the Illinois EPA of each instance in which the volume-weighted average of the total mass of VOC per volume of coating solids, after the control device, if capture devices and control systems are used, is greater than the limit specified in 40 CFR 60.492. If no such instances occur during a particular quarter, a report stating this shall be submitted to the Illinois EPA semiannually. [40 CFR 60.495(b)]

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

Compliance with the emission limits in Conditions 5.5.1, 7.1.3, and 7.1.6 shall be based on the testing and recordkeeping requirements in Conditions 7.1.7 and 7.1.9, respectively. The following procedures shall be utilized to determine compliance with the aforementioned limits:

- a. Compliance with Condition 7.1.3(b) shall be determined by the Permittee demonstrating compliance using the volume-weighted average of the total mass of VOC per volume of coating solids as shown in the equations of Condition 7.1.7(a).

- b. Compliance of each coating with the VOM emission limitations in Condition 7.1.3(d) shall be based on the use of the formulas listed below:

$$\text{VOM Coating Content} = V \times D / [1 - W \times D]$$

Where:

V = Percent VOM in the coating (%)

D = Overall coating density (lb/gal)

$$W = \sum (w_i / d_i)$$

Where:

w_i = Percent exempt compound i in the coating,

d_i = Overall density of exempt compound i, in lb/gal

and the summation \sum is applied over water and all exempt compounds i, in the coating.

- c. Emissions from coating operations shall be determined from the following equations:

- i. For uncontrolled coating operations, emissions shall be determined by:

$$E_{duc} = \sum_{i=1}^n C_i V_i$$

Where:

Summation (i) from 1 to n coatings

E_{duc} = lb VOM emitted per day from uncontrolled coating operations (lb/day)

C = Amount of coating used (gal/day)

V = VOM content of coating including water and exempt compounds (lb/gal)

Subsequently, monthly VOM emissions shall be determined by:

$$E_{muc} = \sum_{i=1}^n E_{duci}$$

Where:

Summation (i) from 1 to n days per month

E_{muc} = Monthly VOM emissions (lb/month)
from uncontrolled coating
operations.

Note monthly emissions (lb/month) shall be converted to (ton/month) by a conversion factor of 2,000 lb/ton.

- ii. For controlled coating operations, emissions shall be determined by:

$$E_{dcc} = (1 - 0.76) \sum_{i=1}^n C_i V_i$$

Where:

Summation from 1 to n coatings applied

E_{dcc} = Emissions from uncontrolled coating
operations (lb/day).

An overall capture and control of 76 percent is required as demonstrated through testing and recordkeeping for the controlled coating lines. See 7.1.12(c)(i) for variable description and monthly emission (E_{mcc}) calculations.

- d. Emissions from ink application shall be determined from the following equations:

- i. For uncontrolled ink application, emissions shall be determined by:

$$E_{dui} = \sum_{i=1}^n I_i W_i$$

Where:

Summation (i) from 1 to n inks applied

E_{dui} = Lb VOM emitted per day (lb/day)
from uncontrolled ink application.

I = Amount of ink used (lb/day)

W = VOM content of ink (weight percent)

Subsequently, monthly VOM emissions from inks E_{mui} shall be determined by the same method as

shown in 7.1.12(c) (i) using daily emissions E_{dci} .

- ii. For controlled ink application, emissions shall be determined by:

$$E_{dci} = (1 - 0.76) \sum_{i=1}^n I_i W_i$$

Where:

An overall capture and control of 76 percent is required as demonstrated through testing and recordkeeping for the controlled coating lines. See 7.1.12(d) (i) for variable description and monthly emission (E_{mci}) calculations by using E_{dci} .

E_{dci} = Emissions of VOM from controlled ink application (lb/day)

- e. Emissions from cleanup solvents shall be determined by the following equations:

$$E_{sm} = E_{sum} - E_{srm}$$

Where:

E_{sm} = Emissions of cleanup solvents per month (lb/month)

E_{sum} = Amount of solvents used per month (lb/month)

E_{srm} = Amount of solvents reclaimed per month (lb/month)

- f. Emissions of VOM determined for annual compliance shall be achieved by the following equations:

$$E_{tm} = E_{muc} + E_{mcc} + E_{mui} + E_{mci} + E_{sm}$$

Where:

E_{tm} = Total VOM emissions from affected coating line (lb/month)

All other variables have been previously defined in this section.

Subsequently, annual VOM emissions shall be determined by:

$$E_{at} = \sum_{i=1}^n E_{mti}$$

Where:

Summation (i) from current month plus the 11 previous months (n=12).

E_{at} = Annual emissions of VOM from affected coating line (tons/yr).

Note monthly emissions (lb/month) shall be converted to (ton/month) by a conversion factor of 2,000 lb/ton.

- g. To determine compliance with Conditions 5.5.1 and 7.1.6 for fuel combustion emission units, the emission from fuel combustion shall be calculated based on the following:

<u>Pollutant</u>	Natural Gas Emission Factors for Combustion Units (<100 mmBtu/hr)
	<u>(lb/mmscf)</u>
NO _x	100
PM	7.6
SO ₂	0.6
VOM	5.5
CO	84

These are the emission factors for uncontrolled natural gas combustion in boilers, Tables 1.4-1 and 1.4-2, Volume I, Supplement F, March, 1998.

7.2 Can Bodymakers and Washer/Dryers

7.2.1 Description

Bodymakers draw and iron cupped aluminum into cans. Water soluble lubricant is used in the drawing process becoming suspended in air. Hoods capturing the droplet laden air are ducted to an oil mist collecting system. The clean air from this system is discharged outside the facility. Formed cans are subsequently washed and dried in the washer/dryer units.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
02	1 Bodymakers (EU05)	12 - 1982 6 - 1995 1 - 2003	Oil Mist Collecting System (CD02)
	2 Can Washer with Dryers (EU03 and EU04)	1982 and 1995	None

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected bodymaker" for the purpose of these unit-specific conditions, is a can drawing and ironing machine that is only subject to 35 IAC 212.321. A bodymaker is subject to the requirements of 35 IAC 212.321 if the bodymaker is a new process emission unit emitting lubricant as particulate matter.
- b. The affected bodymaker constructed after April 14, 1972 is subject to 35 IAC 212.321(b) (1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

- c. Pursuant to 35 IAC 214.303, with the exception of fuel combustion emission sources and acid manufacturing, no person using sulfuric acid shall cause or allow the emission of sulfuric acid and/or

sulfur trioxide from all other similar emission sources at a plant or premises to exceed:

- i. 45.4 grams in any one hour period for sulfuric acid usage less than 1180 Mg/yr (100 percent acid basis) (0.10 lbs/hr up to 1,300 T/yr);
 - ii. 250 grams per metric ton of acid used for sulfuric acid usage greater than or equal to 1180 Mg/yr (100 percent acid basis) (0.50 lbs/T over 1,300 T/yr).
- d. Each affected bodymaker and washer is subject to the emission limits identified in Condition 5.3.2.

7.2.4 Non-Applicability of Regulations of Concern

N/A

7.2.5 Operational and Production Limits and Work Practices

This permit is issued based on 98% PM control achieved by the oil mist collecting system (CD02) servicing the bodymakers.

7.2.6 Emission Limitations

In addition to Condition 5.3.2 and the source wide emission limitations in Condition 5.5.1, the washer/dryer (EU04) is subject to the following limitations:

<u>Item of Equipment</u>	<u>Firing Rate</u> <u>(mmBtu/hr)</u>	<u>NO_x</u> <u>Emissions</u>	
		<u>(lb/hr)</u>	<u>(ton/yr)</u>
Washer Dryer	4.5	0.43	1.88

The above limitations were established in Permit #95050064, pursuant to 35 IAC Part 203 and 40 CFR 52.21. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 and 40 CFR 52.21[T1].

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for each affected bodymaker and washer to demonstrate compliance with Conditions 5.6.1 and 7.2.6, pursuant to Section 39.5(7) (b) of the Act:

- a. Records of material throughput for the bodymakers including aluminum and lubricating oil (T/mo and T/yr).
- b. Records of the oil mist collecting system operation and manufacturers recommended maintenance to assure effective control.
- c. Natural gas consumption (mmscf/mo and mmscf/yr).
- d. Annual emissions of regulated air pollutants calculated based on the recordkeeping requirements of Condition 7.2.9 and compliance procedures of Condition 7.2.12.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7) (f) (ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

- a. Compliance with the emission limits in Condition 5.5.1 from the affected bodymakers shall be based on the recordkeeping requirements in Condition 7.2.9 and a proper maintenance and operation of the oil mist collection system.

- b. Compliance with the emission limits in Condition 5.5.1 and 7.2.6 from the washers shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

Pollutant <u>Type</u>	Emission Factor <u>(lb/mmscf)</u>
NO _x	100
CO	84
VOM	5.5
PM	7.6
SO ₂	0.6

These are the emission factors for uncontrolled natural gas combustion in boilers, Tables 1.4-1 and 1.4-2, Volume I, Supplement F, March, 1998.

Emissions (ton/yr) = Individual natural gas usage (mmscf/yr) x applicable emission factor (lb/mmscf).

7.3 Boilers and Air Makeup Units

7.3.1 Description

Natural gas fired boilers (EU01 and EU02) are used for heating water used in the can washers (see Section 7.2 of this permit) and natural gas fired makeup air units (EU06-EU09) heat outside air and exhaust into the plant.

7.3.2 List of Emission Equipment and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
03	2 Boilers (EU01 and EU02)	1 - 1992 1 - 1995	None
	Makeup Air Units (EU06-EU09)	1982 and 1995	None

7.3.3 Applicability Provisions and Applicable Regulations

An "affected boiler" and "affected air makeup unit" for the purpose of these unit specific conditions, is each boiler and affect air makeup unit listed in Condition 7.3.2.

7.3.4 Non-Applicability of Regulations of Concern

- a. The affected boilers and air makeup units are not subject to NSPS, 40 CFR 60 Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units, since each steam generating units have a maximum heat input less than 10 mmBtu/hr.
- b. The affected boilers and air makeup units are not subject to 35 IAC 216.121, emissions of carbon monoxide from fuel combustion emission sources, since the actual heat input from each combustion unit is less than 2.9 MW (10 mmBtu/hr).
- c. The affected boilers and air makeup units are not subject to 35 IAC 217.141, Existing Emission Sources in Major Metropolitan Areas, since the actual heat input of the boilers is less than 73.2 MW (250 mmBtu/hr).
- d. The affected boilers and air makeup units are not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.303, Fuel Combustion Emission Sources, which excludes fuel combustion emission units from this requirement.

7.3.5 Operational and Production Limits and Work Practices

Natural gas shall be the only fuel fired in the affected boilers and air makeup units.

7.3.6 Emission Limitations

In addition to Condition 5.3.2 and the source wide emission limitations in Condition 5.6, the affected boilers and makeup air units are subject to the following:

Permittee shall not allow emissions from the affected washer boiler (EU01 and EU02) and affected air makeup units (EU06-EU09) to exceed the following limits:

<u>Item of Equipment</u>	<u>Firing Rate (mmBtu/hr)</u>	<u>NO_x Emissions</u>	
		<u>(lb/hr)</u>	<u>(ton/yr)</u>
EU01	5.2	0.5	2.17
EU02	2.1	0.2	0.87
EU06	9.63	0.92	4.02
EU07	9.63	0.92	4.02
EU08	9.63	0.92	4.02
EU09	6.88	0.65	2.87

The above limitations were established in Permit #95050064, pursuant to 35 IAC Part 203 and 40 CFR 52.21. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 and 40 CFR 52.21[T1].

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with Condition 5.6.1 pursuant to Section 39.5(7) (b) of the Act:

- a. Fuel consumption (mmscf/mo and mmscf/yr), and
- b. Fuel combustion emissions (ton/yr) calculated in accordance with the compliance procedures of Condition 7.3.12.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.3.12 Compliance Procedures

To determine compliance with Condition 5.5.1 and 7.3.6 emissions from the affected boilers and makeup air units shall be based on the emission factors listed below:

<u>Pollutant</u>	Natural Gas Emission Factors for Combustion Units (<100 mmBtu/hr) <u>(lb/mm scf)</u>
NO _x	100
PM	7.6
SO ₂	0.6
VOM	5.5
CO	84

These are the emission factors for uncontrolled natural gas combustion in boilers, Tables 1.4-1 and 1.4-2, Volume I, Supplement F, March, 1998.

Boiler Emissions (lb) = (Natural Gas Consumed, ft³) x (The Appropriate Emission Factor)

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after April 21, 2004 (the date of issuance of the draft permit), unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring

(including test methods), recordkeeping, reporting, or compliance certification requirements;

- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
 - i. Describe the physical or operational change;
 - ii. Identify the schedule for implementing the physical or operational change;
 - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
 - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
 - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the

conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7) (f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be

submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7) (e) (i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

- i. Illinois EPA - Air Compliance Section

- Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276

- ii. Illinois EPA - Air Regional Field Office

- Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

- iii. Illinois EPA - Air Permit Section

- Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

- 9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].
- 9.1.2 In particular, this permit does not alter or affect the following:
- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
 - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
 - d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.
- 9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois, 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply with Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7) (o) (iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12) (b) (iv) of the Act].

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7) (e) (ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7) (p) (v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be

submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

- ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1. Attachment 1 - Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- b. The emissions of particulate matter into the atmosphere in any one hour period from the affected coating lines shall not exceed the allowable emission rates specified in the following equation:

$$E = A (P)^B$$

Where:

P = Process weight rate

E = Allowable emission rate

- i. For process weight rates of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

- ii. For process weight rates in excess of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

- c. Limits for Process Emission Units for which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

10.2 Attachment 2 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.3 Attachment 3 - Compliance Assurance Monitoring (CAM) Plan

Table 1 - PSEU Designation:	Line #3
Pollutant:	VOM, HAP
Indicators:	#1: Oxidizer's Temperature #2: N/A

GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Continuous Temperature Monitoring	N/A
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	> 1400°F Oxidizer's Temperature Controlled by Programmable Logic Controller (PLC). If Oxidizer's Temperature Drops Below 1400°F, Alarm Will Sound and Line Will be Shut Down	N/A
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	N/A	N/A

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	A Thermocouple is Used to Obtain Temperature	N/A
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	Weekly Inspections and Replacement of Temperature Chart. Daily PLC Monitoring.	N/A
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	Calibration and Maintenance Completed by Independent Contractor as Needed	N/A
THE MONITORING FREQUENCY:	Continuous	N/A
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	Temperature Chart Recorder	N/A
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	Alarm is Triggered if Oxidizer's Temperature Drops Below 1400°F. Line is Shut Down Until Proper Temperature is Reestablished.	N/A

10.4 Attachment 4 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
 - Corrects typographical errors;
 - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
 - Requires more frequent monitoring or reporting by the Permittee;
 - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA;
 - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits; or
 - Incorporates into the CAAPP permit revised limitations or other requirements resulting from the application of an approved economic incentives rule, marketable permits rule, or generic emissions trading rule.
2. Minor Permit Modification
 - Do not violate any applicable requirement;

- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
 - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA; and
- Are not required to be processed as a significant permit modification.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	I.D. number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. I.D. number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents	
24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.
	<input type="checkbox"/> Yes <input type="checkbox"/> No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?
	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block	
This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:	
BY:	
_____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____ / _____ / _____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.6 Attachment 6 - Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7.
 - a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
- 8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
- 9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

AB:psj